



From the desk of Gerasimos D. Liberatos, Esq.

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July 5, 2023

Via ECF

Hon. Dora L. Irizarry
United States District Court
District of New York
225 Cadman Plaza E
Brooklyn, NY 11201

Re: *Meerovich v. Big Apple Institute, Inc.*
Case No. 1:22-cv-7625
Letter Motion for Extension of Time

Dear Judge Irizarry:

We are attorneys for defendants Big Apple Institute, Inc. and Bronislav Leydiker (collectively “Defendants”) in the above-referenced action. Pursuant to II(D) of this Court’s individual rules, we write to request a fourteen (14) day extension of time for Defendants to file reply papers in further support of their motion to dismiss the complaint from July 11, 2023, to July 25, 2023. Plaintiff has consented to this request.

The reason for this request is because scheduling conflicts have emerged on several matters our office is handling due to vacation schedules and two emergency applications that were filed in another unrelated case last week. Therefore, the undersigned needs additional time to prepare and file reply papers.

The Court has previously granted Plaintiff’s request for a 30-day extension to file its opposition to Defendants’ motion. This is the first request for an extension on Defendants’ reply.

We thank Your Honor’s time and consideration for Defendants’ request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gerasimos Liberatos".

Gerasimos Liberatos